

AUGUST YOUTH Q & As

1. **Question: Can WIA federal funds be used to purchase food?**

Answer: Food is allowable, but as with any WIA costs, it must be reasonable, necessary and allowable. One exception is listed in OMB A-87 - entertainment costs (including meals) is not allowable.

2. **Question: Can someone be enrolled into case management only?**

Answer: Case management is a service you provide in conjunction with enrolled activities. In instances where an individual is between activities (completed out of one WIA funded activity and waiting to be enrolled into another WIA funded activity) and CASE MANAGEMENT IS BEING PROVIDED, that person can be enrolled in case management.

This does not mean you can enroll someone into case management in order to stop termination. If someone is enrolled into case management only, the ISS MUST document that there are planned WIA FUNDED activities they will be enrolled into and CASE MANAGEMENT services are being provided.

An example would be a participant who graduated high school through a WIA program and is waiting to begin college in the fall, funded by WIA. Your ISS would document the individual will receive occupational skills and case management is being provided currently. If WIA is not paying college and no other WIA activities are planned, the participant should be terminated.

Case management would include referrals of other services, help in filing financial assistance, budget planning, career counseling, etc. The ISS must document these case management services. Case management would NOT be contacting a participant once a month to find out status, or holding the participant's case open in case other WIA services MAY be needed.

If a participant has received all WIA funded services needed to complete their goals/objectives listed in their ISS, and no other WIA services are planned, that person should be terminated and follow-up would begin.

3. **Question: Would this be considered an occupational skills goal? “Participant will successfully complete a college course related to career interest and employment goal.”**

Answer: “Successful completion of college course related to career or employment goal” would be the ATTAINMENT of an occupational skills goal, it does not

document the NEED for occupational skills to set the goal. To set the occupational skills goal, you would need to document a deficiency in, or the need for occupational skills (i.e. has no experience, skills or exposure to the career and employment goal).

- 4. Question: If a client is receiving K-TAP and they work under the element of “paid work experience (the pay will come from the program using WIA funds) will this cause them to receive a cut in their K-TAP?**

Answer: According to Ester Wilhoite with Cabinet for Families and Children, if an individual is listed as the adult and/or parent in the K-TAP case, “paid work experience” would count as income and could affect their K-TAP amount. This could be a 16-year-old with a child IF they are listed as the parent/adult in the K-TAP case.

If an individual is listed as a child/dependent in the K-TAP case, “paid work experience” would NOT count as income. A child/dependent is considered someone under 18 or 18/19 and still in school.

- 5. Question: On a medical card, if the fourth digit of the case number is an “X”, does that designate a foster child?**

Answer: According to the “Kentucky Medicaid Eligibility Categories and Program Codes”, the fourth digit of the ID number listed as “X” Program Code means “Foster care children under the supervision of DSS who receives a Title IV E money payment”. This can be used to document foster child for eligibility purposes.

- 6. Question: A program is producing items for purchase by the public. At end of program year, income will be used to provide incentives/scholarships to the participants. What type of clause should included in the contract? How should the income be reported so it can be used for these purposes?**

Answer: the proceeds from the “items to be sold” as described are defined as program income in the Common Rule (29 CFR Part 97.25). Section (a) General, states that “Program income includes income from...the sale of commodities or items fabricated under the grant agreement”. The Common Rule also addressed the cost of generating program income and how the program income should be used.

As far as contract language, your standard boilerplate should currently state that the contractor must comply with the WIA Regulations at 667.200, Administrative Rules, Costs and Limitations. Section 667.200(a), states that “governmental organizations that received grants or cooperative agreements under WIA Title I must follow the common rule “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments’ which is codified at 29 CFR part 97”. In other words, if your boilerplate has the references above in it then the contractor will have to comply with the Common Rule in handling and accounting for any program income earned.

You should add language to your contract's scope of work that spells out that the income received from the sale of the items is program income and they will use the program income to give incentives to the participants and how the amount of the incentives will be determined.

As far as reporting the program income, it is the LWIA's call on how the program income is kept by the contractor and how it is reported to the LWIA. You will only report the program income earned by your contractors to DTR on a quarterly basis via the DTR-38 Quarterly Expenditure Report.